UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

DONGGUAN GUANYI)	
LIGHT-DECORATION CO., LTD.,)	
)	
Plaintiff,)	
)	
V.)	JURY TRIAL DEMANDED
THE PARTNERSHIPS AND)	JURY TRIAL DEMANDED
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A,)	
,)	
Defendants.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 26.2, Dongguan Guanyi Light-Decoration Co., Ltd. ("Guanyi" or "Plaintiff") files this Motion requesting leave to file under seal the unredacted version of Schedule A, which lists the Defendant Internet Stores with URL links and seller aliases.

In this action, Guanyi is requesting temporary *ex parte* relief based on the Defendants' utility patent infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. In this matter, Defendants would likely destroy relevant documentary evidence and hide and/or transfer assets to foreign jurisdiction if they were to learn of these proceedings prematurely, which would interfere with this Court's power to grant relief.

As required by Local Rule 26.2, Plaintiff has provisionally filed the unredacted version of its Sealed Documents and has filed a public-record version of the Sealed Documents with only the sealed information removed via redactions. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Guanyi will move to unseal these documents.

Dated: October 23, 2023 Respectfully submitted,

/s/ Timothy K. Sendek

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